

Remarks

Claim Rejections

Claims 1, 14, and 25-26 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,998,738 to Li (hereinafter "Li") in view of U.S. Patent 5,340,334 to Nguyen (hereinafter "Nguyen").

First, the Official Action states that "It would have been obvious to one of ordinary skill in the art at the time the invention was made to use the electrical terminal pin design of Nguyen for the pins of Lin et al. for the purpose of providing to secure the connector header within the casing." Applicant fails to understand what type of securing that the pins of Lin will bring to Nguyen that Nguyen does not alternatively provide for. Furthermore, Applicant fails to find any motivation or statement that Nguyen requires such securing. Presumably, such securing would be redundant of structure in Nguyen. With this being the only stated reason for the combination, the Official Action has failed to provide a *prima facie* case of obviousness. Furthermore, the proposed combination is a product of hindsight.

Second, the proposed combination would not have a reasonable expectation of success. Substrate 18 of Li is a film. Terminals 70 of Nguyen rely on sufficient surface area to allow a friction fit between terminals 70 and mounting leg 31 of housing 12. First, film 18 of Li is too thin to allow such a friction fit. Second, film 18 is not rigid enough to prevent deformation and thus would allow terminals 5 to be removed. Accordingly, one of ordinary skill in the art would not supply terminals 70 of Nguyen to the film substrate 18 of Li in order to "secure the connector header within the casing." Accordingly, the proposed combination would not be obvious to one of ordinary skill in the art in that it does not have a reasonable expectation of success.

Third, Applicant respectfully disagrees with the interpretation of Nguyen put forth by the Official Action. The Official Action states that element 31 of Nguyen is a substrate. Nguyen refers to element 31 as a mounting leg of housing 12. Accordingly, element 31 is part of the housing, and not a substrate.

Fourth, even using the Official Action's reading of the references, use of terminals 70 of Nguyen in the place of the pins of Li prevents such a combination from reading on the present claims. The Official Action's interpretation states that terminals 70 of Li form a right angle and engage substrate 31. Employing such a configuration in Nguyen causes the

"throughholes" of the "substrate" to fail to be "overlapping with said opening." Accordingly, even when making the proposed combination and even assuming that element 31 of Nguyen is a substrate, the proposed combination fails to teach every limitation of claim 1.

Applicant respectfully requests removal of the rejection of claim 1. Applicant further believes that claim 1 is in condition for allowance. Such allowance is respectfully requested.

Claim 14 was rejected by the Official Action by stating, "the recited method steps would necessarily be performed in the assembly of the above-mentioned system as claim 1." As in the previous response, applicant notes that claim 14 requires "providing a sealing member between said casing and said header which is compressed in the mating direction." Claim 1 fails to discuss such a sealing member. Accordingly, a citation to the rejection of claim 1 is insufficient to further reject claim 14. Applicant respectfully requests removal of the rejection of claim 14. Applicant further believes that claim 14 is in condition for allowance. Such allowance is respectfully requested.

Claim 25 requires that the connector header, casing, and substrate are attached to each other simultaneously. Applicant wishes to clarify that this limitation is a step as opposed to a state of being. This concept is further explored in claim 26 that requires a single movement to achieve the attachment. Furthermore, in that these claims describe a process, the exploded and assembled figures (5-7) that are referenced are insufficient to teach such a process. Additionally, Li describes that flexible film 18 is coupled to base plate 12 via adhesive films 31, 32. Accordingly, Li teaches attachment of flexible film 18 separate from any attachment of electrical connector 36. Thus, the proposed combination fails to render obvious claims 25 and 26.

Claims 2-13 and 15-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lin, as modified, as applied to claim 1 above (combined with Nguyen) and further in view of U.S. Patent No. 6,652,292 to Pratt (hereinafter "Pratt"). Each of claims 2-13 and 15-24 depend from either claim 1 or claim 14. In that claims 1 and 14 are believed to be in condition for allowance, claims 2-13 and 15-24 are also believed to be allowable. Such allowance is respectfully requested.

Additionally, as noted in the previous response, claim 8 depends from claims 1 and 7 and requires "a seal member positioned within said sealing groove and in sealing contact with said sealing wall." In rejecting claim 7, the Official Action stated "Pratt et al disclose the

casing having a sealing groove (22,...) including a seal member (36,...) with a complementary geometry as the upstanding seal wall and being received therein." Assuming that the reversal of parts discussed in the rejection of claim 7, flange 36 is cited as the sealing wall in that it is received in groove 22. Claim 8 requires the seal member to be in contact with the sealing wall. Therefore, flange 36 cannot be both the sealing wall and the seal member as cited by the Official Action. Accordingly, claim 8 is believed to be in condition for allowance.

As noted in the previous response, claim 9 depends from claim 1 and requires "said connector header has a mounting surface which extends at least partially into said opening." The Official Action states that "Pratt et al. disclose the connector header having a mounting surface (38, ...) which extends at least partially into the opening." The rejection further states "it would have been obvious to one of ordinary skill in the art ... to use the flange design of the connector header of Pratt et al., in Li et al., as modified, for the purpose of providing an abutment of the mounting surface of the connector header relative to the opening of the casing." This supposed motivation is a reflexive statement that provides no motivation. In other words, the supposed motivation says "it would have been obvious to do "X" so that you can achieve "X." The stated motivation fails to state why one would be led to do X or want to achieve X. The stated motivation fails to discuss why one would be led to "[provide] an abutment of the mounting surface of the connector header relative to the opening of the casing." Accordingly, the Official Action fails to provide a *prima facie* case of obviousness. Accordingly, claim 9 is in condition for allowance.

As noted in the previous response, Claim 11 requires "wherein said header mounting surface is adhesively fixed to said casing." The Official Action states that "Lin et al., as modified, disclose wherein the header mounting surface is adhesively fixed to the substrate(31...)." "31" of Lin is not a substrate, but rather an adhesive. Furthermore adhesive 31 couples film 18 and casing section 15. Adhesive 31 does not couple a header mounting surface to the casing. Accordingly, the rejection of claim 11 is improper. Removal of the rejection is respectfully requested.

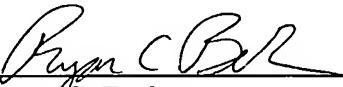
Whereas the Official Action states that the previously submitted arguments are moot in view of the new ground of rejection, applicant respectfully disagrees with this assertion. Applicant respectfully requests that any further Official Action that rejects dependent claims and

continues to rely on Li, Nguyen, Pratt, or any combination thereof includes a response to the above supplied arguments.

If necessary, Applicant requests that this response be considered a request for an extension of time appropriate for the response to be timely filed. Applicant requests that any required fees needed beyond those submitted with this response be charged to the account of Baker & Daniels, Deposit Account No. 02-0390.

The Examiner is invited to contact the undersigned at the telephone number provided below should any question or comment arise during consideration of this matter.

Respectfully submitted,

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